

6/8/2024

Dear Planning Team

Re. P/24/006/FUL - Extension of existing hospital to provide an integrated health and social care centre (Major Development).

We have carried out a full assessment of the proposal in an attempt to provide a satisfactory detailed design to discharge this planning condition;

Condition 10 requires that

Prior to any development above slab level, a design stage Sustainable Construction Report shall be submitted to and agreed in writing by the local Planning Authority. The report shall include details of:

- i. Design stage water usage demonstrating at least BREEAM 2no Wat 01 credits;
- ii. Number and location of air source heat pumps;
- iii. Extent and location of pv panels.

Thereafter the development shall be carried out and operated in full accordance with the approved details.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of and adaptation to predicted climate change, in accordance with Policy SS1 of the Isles of Scilly Local Plan 2015-2030.

We can provide details to satisfy ii. Air Source Heat pumps and iii. PV panels. We have included these for your information to demonstrate this.

In regard to i. we can only achieve 1 credit WAT 01 credits. In regard to the BREEAM WAT01 requirement there is a conflict in legislation between the BREEAM WAT01 and the requirements of BS 8300/HBN (Health Building Notice) WC specification. The WC/ toilet flushing capacity to satisfy the 2 credits required under BREEAM WAT01 is not sufficient for the requirements under the HBN. As it is a health project the HBN (Health Building Notice) will take precedent over BREEAM. The WC/toilet specified can achieve only 1 credit. The showers and Wash Hand Basins to the care home meet the required 2 credits.

Under the BREEAM Assessment Criteria for Healthcare Buildings components in clinical areas can be omitted for the purposes of the assessment (this refers to clinical sinks, wash hand basins, and scrub troughs). Therefore, this only leaves the WC pans and showers as components to be assessed.

Under Table 8.3 of the BREEAM Assessment Criteria WC's need to meet and effective flush volume of 4 litres for the 2no. WAT 01 credits, and the showers meet 8 litres/minute for the 2no. credits (see below extract).

Component type

Table 8.3 outlines the consumption performance levels, by component type, used in BREEAM. These levels of efficiency have been steered by a range of published sources of information⁽¹⁶¹⁾ and reflect robust levels of typical, good, best and exemplary practice.

Table 8.3 Water efficient consumption levels by component type

Component	Performance levels (quoted numbers are minimum performance required to achieve the level)						Unit
	Base	1	2	3	4	5	
WC	6	4.5	4	3.75	3.5	3	Effective flush volume (litres) (see Definitions on page 216)
Wash-hand basin taps	10	8	6	5	4	3	litres/min
Showers	12	10	8	6	5	3.50	litres/min
Baths	200	180	160	140	120	100	litres
Urinal (2 or more urinals)	7.50	6	3	1.50	0.75	0	litres/bowl/hour
Urinal (1 urinal only)	10	8	4	2	1	0	litres/bowl/hour
Greywater and rainwater system	0%	0%	0%	25%	50%	75%	% of WC or urinal flushing demand met using recycled non-potable water

The proposed Home Shower meets the requirement (see attached data sheet). However all of Ideal Standards Healthcare compliant WC's only provide 4.5 litre effective flush volume which is only enough for 1no credit. To obtain the 2no credits with a 4 litre effective flush volume a WC pan with a dual flush push button needs to be specified, which requires a dual flush push button in lieu of a spatula lever flush. This goes against the guidance in not only BS 8300, but also the BREEAM assessment criteria for WAT01 as per the below extract. The other issue is that the dual flush provides 4 and 2.6 litre flush volume, which the latter is very low and will struggle to effectively flush solid matter away.

Additionally for Healthcare building types only:

- 5 If applicable, the flushing control for each WC or urinal must be suitable for operation by patients with frail or infirm hands or activated by electronic sensors (see 2.0 on the previous page).

Based on this we cannot achieve the 2no. WAT01 credits being requested, whilst providing a compliant BS 8300/HBN WC specification.

We request that the condition is varied to read;
Condition 10 requires that

Prior to any development above slab level, a design stage Sustainable Construction Report shall be submitted to and agreed in writing by the local Planning Authority. The report shall include details of:

- i. Design stage water usage demonstrating at least BREEAM 1no Wat 01 credits;

- ii. Number and location of air source heat pumps;
- iii. Extent and location of pv panels.

Thereafter the development shall be carried out and operated in full accordance with the approved details.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of and adaptation to predicted climate change, in accordance with Policy SS1 of the Isles of Scilly Local Plan 2015-2030.

Yours Faithfully

Angela Warwick
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